

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: THE ART INSTITUTE OF PHILADELPHIA LLC, <i>et al.</i> , ¹ Debtors.	Chapter 7 Case No. 18-11535 (LSS) (Jointly Administered)
GEORGE L. MILLER, Chapter 7 Trustee, Plaintiff, v. TODD S. NELSON, JOHN R. McKERNAN, SAMUEL C. COWLEY, EDWARD WEST, MARK A. McEACHEN, FRANK JALUFKA, J. DEVITT KRAMER, MARK NOVAD, JOHN DANIELSON, AND MICK BEEKHUIZEN, Defendants.	Adv. No. 20-50627 (LSS) Ref. Adv. Docket No. ____

**ORDER GRANTING MOTION TO DISMISS OF
DEFENDANTS JOHN DEVITT KRAMER AND MARK NOVAD**

Upon the motion (the “**Motion**”) of defendants John Devitt Kramer and Mark Novad (the “**Defendants**”) for entry of an order dismissing the Complaint [Adv. Docket. No. 1], filed by plaintiff George L. Miller, as Chapter 7 Trustee for the Debtors’ bankruptcy estates, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, as incorporated by Rule 7012(b) of the Federal Rules of Bankruptcy Procedure; and the Court having considered the opening brief in support of the Motion (the “**Opening Brief**”); and the Court having found that it has jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and

¹ See footnote 1 of Complaint (as defined below) for a complete list of debtors (the “**Debtors**”) in the above-captioned jointly-administered chapter 7 cases.

the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and it appearing that venue in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that due and proper notice of the Motion has been given and that no other or further notice is necessary; and the Court having found and determined that the legal and factual bases set forth in the Motion and the Opening Brief establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The Motion is GRANTED as set forth herein.
2. The Complaint is hereby DISMISSED as against the Defendants.
3. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.